



July 26, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Submission of the Fiber Broadband Association, GN
Docket No. 18-122**

Dear Ms. Dortch:

The Fiber Broadband Association is dedicated to accelerating the deployment of all-fiber networks to residences, businesses, wireless sites, and other end points throughout the country. As such, we are agnostic on how the Federal Communications Commission (“Commission”) allocates spectrum, and we do not normally get involved in proceedings at the Commission addressing such matters. However, in recent filings in the above-referenced docket, various stakeholders have proposed transitioning multichannel video program (“MVPD”) C-band users and MVPD programmers off the C-band and onto fiber when this spectrum is reallocated for terrestrial use.¹ The Fiber Broadband Association supports seizing the opportunity of reallocating C-band spectrum to expedite the ongoing transition from satellite to fiber video programming delivery for all MVPDs and their programmers. It is well recognized that all-fiber networks provide virtually unlimited performance and are highly reliable and future-proof. Moreover, all-fiber network providers offer Service Level Agreements and multi-path connectivity that ensure the level of redundancy that video program delivery requires. As a result, we have been seeing for years the natural evolution of video programming delivery from satellite to fiber, particularly in larger markets. MVPDs operating in smaller communities and more rural areas would similarly benefit from moving to fiber. It is for that reason that the Fiber

¹ See, e.g., Letter from Ross Lieberman, Senior Vice President, Government Affairs, ACA Connects – America’s Communications Association, Alexi Maltas, Senior Vice President & General Counsel, Competitive Carriers Association, and Elizabeth Andrion, Senior Vice President, Regulatory Affairs, Charter Communications, Inc. to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 18-122 (July 2, 2019) (MVPDs and MVPD programmers would move to “redundant, future-proof assets they would own and operate (fiber construction in some cases and Indefeasible Rights of Use (“IRUs”) in others.”).

Broadband Association supports proposals that would factor into any C-band transition the opportunity for additional MVPDs, including rural MVPDs, to have access to future-proof fiber networks to access video programming. Not only would these fiber networks facilitate and enhance video programming delivery, but they would serve as a foundation for consumers in rural areas to have access to higher performance broadband service, 5G wireless service, and numerous other advanced services that are fundamental to the future of rural areas and are dependent on fiber as core infrastructure.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.²



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² 47 C.F.R. § 1.1206.